

EXHIBIT A

Event	PAN's Proposed Compromise	BT's Proposed Compromise
Rule 16 Conference		8/21/2023
Rule 26(a)(1) Initial Disclosures		8/25/2023
Submission of Protective Order		9/11/2023
Paragraph 3 Disclosures under Court's Default Standard for Discovery, Including Discovery of Electronically Stored Information		9/21/2023
Plaintiff Production of license agreements (¶ 6(a))		60 days after entry of Protective Order
If Court Order needed to produce license agreements, Plaintiff shall file any necessary proposed orders no later than		45 days after entry of Protective Order
Paragraph 6(b) Disclosures ¹ (Identification of Accused Products)		9/21/2023
Paragraph 6(c) Disclosures (Produce Core Technical Documents)		10/17/2023
Paragraph 6(d) Disclosures (Initial Infringement Chart)		11/17/2023 (PAN proposes limiting to 20 claims) (BT believes limits are premature at this stage)
Paragraph 6(e) Disclosures (Initial Invalidity Chart)		12/22/2023 (PAN proposes prior art combinations limited to 5 per claim)

¹ Rule 16 Scheduling Order - Patent - Revised 03/22 found at <https://www.ded.uscourts.gov/judge/magistrate-judge-christopher-j-burke>

	(BT believes limits are premature at this stage)	
Exchange claim constructions (¶ 12)	3/22/2024	1/23/2024
Submission of Joint Claim Construction Chart (¶ 12)	4/18/2024	2/23/2024
Plaintiffs to serve Opening Claim Construction Brief (¶ 13)	5/17/2024	3/25/2024
Defendants to serve Answering Claim Construction Brief	6/17/2024	4/24/2024
Plaintiffs to serve Reply CCB	7/01/2024	5/8/2024
Defendant to serve sur-reply CCB	7/15/2024	5/22/2024
Interim Status Report	7/22/2024	5/29/2024
Filing of Joint Claim Construction Brief	7/22/2024	5/29/2024
Substantial completion of document production	8/22/2024	6/26/2024
Markman Hearing (¶ 14)	9/23/2024	6/26/2024
Claim Construction Order (Assumed) ²	11/22/2024	8/26/2024
Joinder of other parties and amendment of pleadings	12/23/2024	9/24/2024
Final infringement contentions (¶ 6(f))	12/23/2024 (PAN proposes to limit asserted claims to 10)	9/24/2024 (BT believes limits are premature at this stage)
Final invalidity contentions (¶ 6(g))	1/23/2024 (PAN proposes to limit prior art combinations to 3 per claim)	10/8/2024 (BT believes limits are premature at this stage)
Close of fact discovery (¶ 7(a))	2/21/2025	10/28/2024

² The following deadlines assume the Court will issue its Claim Construction Order on or before the proposed dates.

Opening expert reports by the party with initial burden of proof (¶ 7(f)(i))	3/14/2025	11/18/2024
Rebuttal expert reports	4/14/2025	12/18/2024
Reply expert reports	4/28/2025	1/2/2025
Close of expert discovery	5/28/2025	1/31/2025
Dispositive Motions	7/14/2025	2/18/2025
Objection to Expert Testimony	7/14/2025	2/18/2025
Hearing on Dispositive Motions / Objections	8/29/2025	3/31/2025
Pretrial Conference	11/14/2025	5/30/2025
Trial	December 2025	June 2025